

REMARKS

Claims 1, 2, 4, 6-23, 25, 27, 28, 30-43 and 45-47 are pending. In the Office Action mailed on April 19, 2005, the Examiner rejected claims 1, 2, 4, 6-23, 25, 27, 28, 30-43 and 45-47 under 35 U.S.C. § 103(a) over U.S. Patent No. 5,490,241 to Mallgren et al. ("Mallgren"). In this response, Applicants amend claim 9 to correct an inadvertent error. Further examination and review in view of the amendment and remarks below are respectfully requested.

Applicants are grateful to the Examiner for the courtesy extended to Applicants during the June 14, 2005, telephonic interview.

Applicants' techniques are directed to dynamically establishing and displaying gridlines to assist a user position and/or reposition objects in a drawing. Some of the techniques provide a drawing program that determines a likely destination of a next user-placed object based on the present location of objects already present in the drawing. Upon determining the likely destination, the drawing program displays a dynamic gridline to the user. If the user decides to align the next user-placed object to these objects already present in the drawing, the user drags the next user-placed object near the displayed gridline, and the drawing program automatically aligns the next user-placed object to the displayed gridline. Some of the techniques locate the dynamic gridlines on the display using zones or bands located above, below, and to the sides of the next user-placed object that the user is currently dragging to a new location on the display.

All of the claims stand rejected over Mallgren. Applicants respectfully traverse the Examiners rejections.

In contrast to Applicants' techniques for dynamically establishing and displaying gridlines to assist a user position and/or reposition objects in a drawing, Mallgren merely describes a technique for providing a user the ability to create user-specified objects in linear, angular, paraline and perspective geometries. (see Abstract and col. 3, lines 19-

36). Mallgren provides stationary and moving polar grids which restrict a drawing to a user-specified geometry. (col. 5, line 18-col. 6, line 2). According to Mallgren, the construction of objects in a drawing is accomplished by the placement of control points. When drawing, the user is free to move the cursor to any point on the drawing surface, however, when the user places a control point, for example, by clicking on a button on a mouse, the position of the cursor is translated into the nearest grid point. "Gridding" the control point to the nearest grid point assists the user in constructing objects which must maintain precise linear, angular, paraline, or perspective geometries. (col. 6, lines 3-13).

Figs. 4A-4I in Mallgren clearly illustrate the operation of a moving grid for constructing an object in a particular geometry. In the illustration of the moving grid, the origins of the moving grid (i.e., the origins of the grid as the grid is moved to new locations) move in response to control point placement. (col. 5, lines 37-39). In Fig. 4A, the control point (indicated by the character "+") causes a paraline grid having the origin at the control point to be displayed. When the user moves the cursor up one of the displayed gridlines and places a new control point (as shown in Fig. 4B), the position of the cursor (i.e., the new control point) is gridded to the nearest grid point on the grid line, and this causes a paraline grid having the origin at the new control point to be displayed, as illustrated in Fig. 4B. In this manner, the user is able to create (i.e., draw) a rectangle in paraline geometry in a "connect-the-dot" manner by moving the cursor along or near a desired gridline to place a control point, which causes the display of the moving grid having the current control point as the origin of the moving grid.

Claims 1, 2, 4 and 6-8 each include the features of (1) identifying a first object and a second object previously placed on the display within a band of a selected object as the selected object is dragged to a location on the display, and (2) displaying a select one of these two gridlines in response to the selected object being dragged to a location, where the gridlines assist a user in repositioning the selected object on the display with equal spacing between the first object, the second object, and the selected object. Mallgren does not disclose, suggest or teach identifying a first object and a second object previously

placed on the display within a band of a selected object as the selected object is dragged to a location on the display, nor does it disclose, suggest or teach displaying a select one of these two gridlines in response to the selected object being dragged to a location, where the gridlines assist a user in repositioning the selected object on the display with equal spacing between the first object, the second object, and the selected object.

In response to Applicants' argument in its October 28, 2004, amendment that Mallgren not disclose, suggest or teach displaying a gridline in response to the selected object being dragged to a location, the Examiner concedes in the present Office Action that "Mallgren does not state that the selected object is dragged to the location while the gridline is displayed," but asserts that "[Mallgren] does disclose manipulating a control point which manipulates the new object's control point," that "[i]t would have been obvious to a person of ordinary skill in the art at the time of the invention to drag an object to a location while providing gridlines as a guide because Mallgren's control point takes into account the horizontal and vertical alignment of a new object while trying to place the object precisely within a display," and that "since the control point is used to align the new objects with previously drawn objects, it would have been obvious to a person of ordinary skill in the art at the time of the invention that manipulation of a control point of a new object is similar to the manipulation of the actual object since it is an attempt to optimally place the new object in an aligned position."

Applicants respectfully disagree. In contrast to the Examiner's assertion, Mallgren's control point is not used to align the new objects with previously drawn objects. As discussed above, Mallgren's control point serves as an origin of a moving grid and the gridlines of the grid assist the user in positioning a control point by gridding the control point to the nearest grid point. (col. 6, lines 8-11). In Mallgren, there is no dependence or relationship between it's gridding operation, which positions the cursor or control point, and the other objects in the drawing. Applicants can find in Mallgren no disclosure or suggestion for positioning an object in a drawing in reliance or relationship to other objects in the drawing.

With regard to Mallgren's FrameObject, this is a record variable that contains information (e.g., the default properties such as line, area, point, and text) needed to display, edit, or print an illustration that is in a frame on the display. While Mallgren states that the FrameObject contains pointers which point to the top-most and bottom-most objects in the frame, Mallgren does not contain any further discussion regarding the operation of these pointers which point to the top-most and bottom-most objects in the frame, and the purpose of the top-most and bottom-most objects in the frame. Rather, Mallgren only states that the FrameObject is one of the main data structures for gridding. (col. 9, line 1-col. 10, line 31).

Claims 9-15, 40 and 41 each include the feature of determining a likely destination for a selected object being moved in a drawing that has two other objects situated on the display so that there is a separation between them, where the likely destination for the selected object is determined so that the distance between the selected object and one of the other two objects is the same as the distance between the two other objects. As discussed above, Mallgren performs a gridding operation to position a control point to the nearest grid point. (col. 6, lines 3-13). According to Mallgren's gridding operation, the destination of the control point is the nearest grid point, which is in contrast to the destination being determined so that the distance between the selected object and one of the other two objects is the same as the distance between the two other objects. Applicants can find in Mallgren no such disclosure or suggestion.

The remaining claims each include similar features of positioning an object in a drawing in reliance or relationship to other objects in the drawing. For example, claims 16-23 include the common feature of dynamically displaying a temporary gridline that facilitates equal spacing between a plurality of objects while a selected object is moved within a drawing. Likewise, claims 25, 27, 28, 30-35, 42, 43 and 45 include the common feature of establishing and displaying temporary gridlines spaced a distance D and a distance 2D from a placed object, where D is computed by adding the width of the placed object and a default avenue distance, and the gridlines are displayed as the selected

object is moved in the drawing. Similarly, claims 36-39 include the common feature of determining perpendicular gridlines intersecting at a point that indicates a position for a selected object, where the selected object is linearly aligned with two other identified objects, and one of the two identified objects is halfway between the other identified object and the selected object; claim 46 includes the feature of a device for displaying two calculated gridlines, one for aligning a selected object with a placed object and one for positioning the selected object at a predetermined distance from the placed object, where the predetermined distance is the distance between this placed object and another placed object; and claim 47 includes the feature of perpendicular gridlines intersecting at a point that indicates a position for a selected object so that the object is aligned with and uniformly spaced from other objects previously placed on the page, where at least one of the gridlines be displayed when the selected object is dragged within a certain distance of a gridline. As discussed above, Mallgren does not disclose, suggest or teach positioning an object in a drawing in reliance or relationship to other objects in the drawing.

Conclusion

In view of the foregoing, Applicants respectfully submit that claims 1, 2, 4, 6-23, 25, 27, 28, 30-43 and 45-47 are allowable and ask that this application be passed to allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8000.

Dated:

Respectfully submitted,

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